

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Sandra Kernaghan,)	
)	
Plaintiff,)	No. 08 C 102
)	
v.)	Judge St. Eve
)	
City of Chicago, a municipal corporation, and unknown Chicago Police Officers John Does and Jane Roes 1-20;)	Magistrate Judge Nolan
)	
	(
Defendants.)	

**DEFENDANT CITY OF CHICAGO'S AGREED MOTION
FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE
PLEAD TO PLAINTIFF'S COMPLAINT**

Defendant City of Chicago (the "City"), by its attorney, Mara S. Georges, Corporation Counsel of the City, moves for an extension of time of thirty (30) days, up to and including March 14, 2008, to answer or otherwise plead to plaintiff 's complaint. The City states the following in support of this motion:

1. Plaintiff filed his six-count complaint on January 7, 2008. The complaint alleges federal claims under 42 U.S.C. 1983 against unknown officers of the Chicago Police Department and an Illinois state law claim for statutory indemnification against the City.
2. Plaintiff's complaint and summons were served on the City on or about January 9, 2008. The City's answer or other pleading to the complaint was due on January 29, 2008.
3. On February 13, 2008, undersigned counsel was assigned to this case and filed an appearance on behalf of the City.

4. To properly answer or otherwise plead, the City requests a thirty (30) day extension of time to March 14, 2008, by which time it should have the opportunity to investigate plaintiff's allegations and gather and review any pertinent records.

5. This motion is not being brought for the purpose of delay or any other improper purpose.

6. Plaintiff's counsel, Daniel Kiss, has agreed to a thirty (30) day extension of time for the City to answer or otherwise plead to the complaint.

7. Plaintiff will not be prejudiced if the requested extension of time is granted.

WHEREFORE, the City respectfully requests that this Court grant it an extension of time of thirty (30) days, up to and including March 14, 2008, to answer or otherwise plead to plaintiff's complaint.

Dated: February 13, 2008

Respectfully submitted,
MARA S. GEORGES,
Corporation Counsel of the City of Chicago

By: /s/ Kenneth Charles Robling
KENNETH CHARLES ROBLING
Assistant Corporation Counsel

30 North LaSalle Street, Suite 1020
Chicago, Illinois 60602
312-744-4939

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on February 13, 2008, he electronically filed the foregoing Defendant City of Chicago's Agreed Motion for an Extension of Time to Answer or Otherwise Plead to Plaintiff's Complaint with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record in this matter registered to receive notice through the CM/ECF system.

By: /s/ Kenneth Charles Robling
KENNETH CHARLES ROBLING